

Testimony of Connecticut Fund for the Environment Before the Public Health Committee

In Opposition of H.B. No. 6617, AN ACT CONCERNING WATER SUPPLY PLANS

Submitted by Eric Annes, Legal Fellow March 6, 2009

Connecticut Fund for the Environment ("CFE"), with a total membership of approximately 6,000 Connecticut members, uses law and science to defend Connecticut's air, land and water.

CFE opposes bill H.B. 6617, An Act Concerning Water Supply Plans. Limiting the requirement of the Commissioner of the Department of Environmental Protection's approval for water supply plans to only issues where DEP's approval is already required is not a concept the Connecticut Fund for the Environment supports. There are issues where no agency is required to give formal approval but is still are important environmental issues. One such issue is water conservation. Water supply plans need and should address water conservation. However, no permit or other DEP review directly addresses this issue. Accordingly, removing the need for DEP approval for water supply plans removes the DEP's oversight of water conservation in water supply plans. This is an unwise legislative initiative as DEP is the best agency for ensuring water supply plans properly considers water conservation.

A second major concern of CFE's with H.B. 6617, An Act Concerning Water Supply Plans, is that the bill does not require that an entire water supply plan be reconsidered at a regular time interval. Thus, the bill does two things that are of concern. First, the bill extends the time for supply plan review from five years to ten years. Second, at the same time the bill extends the time period for review, the bill narrows the scope of review. While CFE does not necessarily object to the extension of the time period of review, CFE strongly objects to extending the time period while narrowing the scope of review. A deci-annual period of review may be sensible if the review is comprehensive. Many variables change over a decade time period, including understanding of a watershed, knowledge of rain inputs (changing due to global warming), population and development patterns to name a few. So, CFE requests that the committee remove the language allowing for plans to be only revised in part.